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Mr. Jake Burgess
Sydney Zoo
By email: jake.burgess@thezoo.sydney

1/08/2017

RE: URBIS SUBMISSION

Dear Jake,

Thank you for the opportunity to provide a response to the Urbis submission to the Planning Assessment Commission, dated 26th July.

I would like to make a couple of initial context-setting comments before responding to the specific submissions made by Urbis.

Urbis, engaged by Elanor Investors Group, are advocating for their client's interests and it is through this lens that their comments should be considered. The principal author would not be seen as a social planning expert, and are not suitably qualified to make informed, independent commentary on the available evidence and the SIA methodology. The Urbis Submission demonstrates a misunderstanding of the basis on which opinion is formed in a social impact assessment process, and the appropriate use of social research (rather than consumer research).

Secondly, the UTS SIA did not offer a critique of the social planning aspects of the Urbis Socio Economic Impact Report of November 2016 (2016 Urbis Report). As this is in part relied on in the Urbis Submission I make the following comments below in this letter. The 2016 Urbis Report is not an adequate Social Impact Assessment as it fails to meet the threshold for independence, nor does it provide rigorous social research evidence to underpin the forming of an opinion as to the anticipated public benefits or costs of the proposal. Specifics are addressed further in this letter.

Thirdly, there are some assumptions made regarding the mix of Australian and exotic species which I understand are incorrect and have subsequently been clarified with the PAC by SZ. My comments in this letter will therefore not address these issues.

I will confine my comments to matters relating to the methodology of the UTS SIA and the basis of opinion provided, as raised by Urbis in their submission. In short, the Urbis Submission is a series of assertions, not based on evidence or informed assessment, providing no counter evidence as a basis of their contestation, and cannot be considered anything other than advocacy for what Urbis see as their client's interests.

The UTS SIA considers community and public impacts, costs and benefits and potential cumulative impacts within a public/community interest frame, as is appropriate for a Social Impact Assessment.

Featherdale Submission	UTS response
<p>The UTS SIA has not been prepared in accordance with the SIA and CBA Guidelines because it does not meet many material requirements of those Guidelines.</p> <p>UTS does not independently verify proponent information, it makes no attempt to quantify whether the benefits resulting from the Sydney Zoo development would outweigh its negative economic and social costs/impacts, and the cumulative impacts from both the Sydney Zoo and Featherdale operations is not considered.</p>	<p>The SIA has been prepared in accordance with the relevant guidelines and this has been verified through consultation with the relevant officer in the NSW Department of Planning and Environment.</p> <p>The evidence provided is triangulated by the use of three separate and comprehensive data sources:</p> <ol style="list-style-type: none"> 1. Firstly, evidence of what has actually occurred in related contexts through academic peer assessed research work. This provided an important basis on which to assess what has actually occurred elsewhere and a basis for what will likely occur with respect to tourism clusters in this case. 2. Secondly, the claims of SZ have been extensively tested by a range of key stakeholder interviews with identified relevant experts. There is a limited pool of expert individuals in this field and extensive efforts ensured that the right experts were engaged and their views are widely and fully reported. 3. Thirdly the quantitative research is statistically robust due to its sample size (with a confidence ratio of +/- 95%). The sample was random and representative and asked questions canvassing values, knowledge, attitudes and actual behaviour, and anticipated future behaviours. <p>Together these data sources provide a statistically robust range of evidence from which to draw conclusions and form opinion.</p>
<p>The Co-existence Scenario is the least likely scenario and the Sydney Zoo Scenario is the most likely scenario.</p> <p>Sydney Zoo has told Featherdale that it wants to match Featherdale's offering but at Sydney Zoo.</p>	<p>Refer to point one. The Urbis Socio Economic Impact Report of November 2016 is not based on a random and representative sample of respondents. It asked questions of only a small number of customers of the current Featherdale</p>

<p>There is no intent by Sydney Zoo to coexist.</p> <p>The conclusion that the Sydney Zoo Scenario (i.e. closure of Featherdale) is the least likely scenario and that the Co-existence Scenario is the most likely scenario is not based on any robust empirical evidence.</p> <p>The Hill PDA and Urbis Reports demonstrate the risk of closure or reduction in environmental and social programs is higher.</p>	<p>facility - not of the future market and most importantly takes no account of wider community or social benefits or costs (most importantly not the population of Western Sydney).</p> <p>It is in no way an adequate basis on which to draw social impact conclusions. The purpose of a social impact assessment is not just to consider the potential impact on a specific facility - i.e. Featherdale in this case but to consider the overall community impacts and benefits of the proposal.</p> <p>The approach taken by Urbis appears to be a limited sample of market or consumer research, with no consideration of the wider community social and community benefits and impacts. This is not an appropriate methodology as the basis for an SIA nor does it provide the basis on which to form opinions of social impact. It is only taking into account the issues that Urbis consider relevant to their client Featherdale and not the broader Western Sydney community.</p> <p>The UTS SIA is a statistically representative sample based on the primary locality for the social programs of Western Sydney, the primary localities for the conservation programs as the whole of NSW and secondary locality as the Sydney regional and secondary catchment.</p> <p>The Urbis Socio Economic Impact Report of November 2016 is based on 255 intercept surveys of customers at Featherdale. This sample is not random, statistically significant nor representative of those for whom community social impacts or benefits should be assessed.</p> <p>The UTS SIA is based on academic literature, over 40 expert key stakeholder interviews and a statistically significant sample of 650 randomly chosen respondents.</p> <p>Nowhere in the Urbis response does it outline what would have been a more appropriate basis for underpinning evidence for an SIA than was</p>
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	provided in the UTS SIA.
<p>Sydney Zoo is not sufficiently differentiated from Featherdale for the purposes of ensuring market demand for both facilities.</p> <p>The UTS conclusion is flawed and not based on any robust empirical evidence.</p>	<p>See my opening comments for the issues related to market offering and differentiation.</p> <p>The UTS SIA is based on the population of Western Sydney - all of whom are potential beneficiaries of the proposal and Featherdale. This section of the Urbis response demonstrates a lack of understanding between statistically representative social research which is the appropriate basis for assessments made in SIAs and market or consumer research which uses intercept surveys based on existing customers (ie based on an individual facility - Featherdale - which in no way could be considered representative of Western Sydney) and which is the basis for product or market development only, and is not social research and is in no way an adequate basis of evidence for SIAs. The UTS SIA survey contents, sample size and response rates are consistent with rigorous social research approaches and protocols.</p> <p>The reporting of the findings are not 'theoretical' they are based on the answers provided by a representative sample of respondents. The survey reports answers to questions about intended behaviours based on the scenarios drawn from a review of the literature. It is thorough, comprehensive and accurately reported. The Urbis Socio Economic Impact Report of November 2016 research evidence does not provide any basis on which an assessment of the issues raised here could be evidence based relevant to assessing community social and economic impacts and benefits.</p>
<p>The majority of potential consumers would not attend both Sydney Zoo and Featherdale, and would not prefer Featherdale over Sydney Zoo.</p> <p>The practical reality is that potential consumers will be constrained (for reasons of cost, time and interest) from attending both facilities.</p>	<p>See responses to points three and two above.</p>

<p>Sydney Zoo will not increase overall visitor participation because true ‘thematic complementarity’ will only occur where on operation has exotic animals and the other native animals.</p> <p>There is no compelling evidence presented that the market is large enough to support both Sydney Zoo and Featherdale.</p> <p>The UTS conclusion is flawed and not based on any robust empirical evidence.</p> <p>The Urbis market research on the other hand frames and links questions regarding future usage to real behaviour, making it more robust than the UTS survey.</p> <p>Most of the visits to Sydney Zoo would be a redirection of already existing business from other facilities. The majority of the visits to Sydney Zoo will not be additional demand and will not generate additional economic benefits.</p> <p>Therefore, the UTS SIA like the KPMG and HillPDA reports overstate the extent of economic and social benefits claimed.</p>	<p>The claims made by Urbis here are simple assertions.</p> <p>The assessment made in the UTS SIA is evidence based, nuanced and uses the appropriate basis for the conclusions made from three separate and independent data sources.</p> <p>There is no counter evidence provided nor any basis on which the evidence provided by UTS could be challenged.</p>
<p>Featherdale’s social, education and conservation programs have material value as demonstrated in the Urbis Reports.</p> <p>The fact that certain programs offered by Featherdale are not ‘unique’ does not necessarily mean that they do not provide value for the purposes of the PAC’s determination as to whether Sydney Zoo will give rise to overall adverse social impacts in the locality.</p> <p>In addition to Featherdale’s more high profile social, education and conservation programs Featherdale also plays a significant animal welfare role in the locality – and accepts over 1000 animals (including natives) a year from members of the public that are injured, distressed or abandoned.</p>	<p>The UTS SIA outlines in substantial detail the basis on which the contributions of Featherdale’s conservation programs have been assessed. The Urbis Submission simply restates the assertions made by the operators regarding their uniqueness - our research provides compelling contrary evidence based on peer reviewed research and expert interviews.</p>
<p>Featherdale’s social, education and conservation programs cannot be [easily] replicated in the</p>	<p>There is no disagreement that the locality is Blacktown LGA and the Western Sydney</p>

<p>locality which is the Blacktown LGA and Western Sydney Region.</p> <p>There is no compelling evidence presented that the Featherdale's social, education and conservation programs will be replicated at Sydney Zoo.</p>	<p>Region. This is consistent with the previous reports. The evidence that Featherdale's program can be replicated by Sydney Zoo is based on the stakeholder interviews of experts in their respective fields along with the detailed supporting materials provided by SZ and previously reviewed and accepted by the PAC.</p>
<p>Approval of Sydney Zoo will result in significant net adverse social impacts in the locality because it will most likely result in the closure of Featherdale, Featherdale's social, educational and conservation programs have material value, and these programs will not be replicated by Sydney Zoo or any other facilities in the locality.</p>	<p>The evidence provided in the UTS SIA suggests that co-existence scenario is the most likely outcome.</p>
<p>There is no statement of commitment or conditions ensuring intended programs will be implemented.</p>	<p>No new points made here – please refer to above.</p>

Yours sincerely,



Prof. Roberta Ryan